

Steven M. Wells  
Steven M. Wells, P.C.  
431 W. 7<sup>th</sup> Ave.  
Suite 107  
Anchorage, AK 99501  
(907)279-3557  
(907)279-3558 fax  
[steve@stevenmwellsllaw.com](mailto:steve@stevenmwellsllaw.com)

Attorney for Defendant

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

JAMSHID NORRYIAN,

A.K.A. JAMES NORRYIAN, *ET. AL.*,

DEFENDANTS.

Case No. 17-cr-155-L

OBJECTIONS TO PROPOSED  
EXHIBITS

THIS PLEADING PERTAINS TO

MICHAEL TABA, [D-07]

Dr. Michael Taba, accused, hereby files the following objections to Proposed Exhibits.

Dr. Taba takes no position on any exhibit not specifically listed here. To save space, Dr.

Taba only addresses exhibits to which he specifically objects.

#### GOVERNMENT EXHIBITS

| Government Exhibit Number | Identification   | Objection  | Notes |
|---------------------------|--|--|-------|
| 212                       | DOL Billing Data for Ability                                   | 403 – Prejudice; Misleading<br>802 – Hearsay<br>901 – Authentication<br>1006 – Accuracy; Improper Use of summary |       |
| 213                       | BCBS Billing Data for Ability and Industrial & Family Pharmacy | 403 – Prejudice; Misleading<br>802 – Hearsay<br>901 – Authentication<br>1006 – Accuracy; Improper Use of summary |       |
| 214                       | DOL Billing Data for Industrial & Family Pharmacy              | 403 – Prejudice; Misleading<br>802 – Hearsay<br>901 – Authentication<br>1006 – Accuracy; Improper Use of summary |       |
| 215                       | DOL Billing Data for Park Row Pharmacy                         | 403 – Prejudice; Misleading<br>802 – Hearsay<br>901 – Authentication<br>1006 – Accuracy; Improper Use of summary |       |
| 216                       | BCBS Billing for Park Row Pharmacy                             | 403 – Prejudice; Misleading<br>802 – Hearsay<br>901 – Authentication<br>1006 – Accuracy; Improper Use of summary |       |

|     |  |  |  |
|-----|--|--|--|
| 217 | DOL Third Party Billers                | 403 – Prejudice; Misleading<br>802 – Hearsay<br>901 – Authentication<br>1006 – Accuracy; Improper Use of summary                             |  |
| 218 | Prime Therapeutics - Ability           | 403 – Prejudice; Misleading<br>802 – Hearsay<br>901 – Authentication<br>1006 – Accuracy; Improper Use of summary                             |  |
| 219 | Prime Therapeutics – Park Row          | 403 – Prejudice; Misleading<br>802 – Hearsay<br>901 – Authentication<br>1006 – Accuracy; Improper Use of summary                             |  |
|     |  |  |  |
| 421 | Summation of Claims for R.C. – Count 7 | 403 – Prejudice; Misleading<br>802 – Hearsay<br>901 – Authentication<br>1006 – Accuracy; Improper Use of summary; Records Are Not Voluminous |  |
| 422 | Claims for R.C. from VA – Count 7      | 403 – Prejudice; Misleading<br>802 – Hearsay<br>901 – Authentication<br>1006 – Accuracy; Improper Use of summary; Records Are Not Voluminous |  |
| 425 | Claim for L.B. from VA – Count 8       | 403 – Prejudice; Misleading<br>802 – Hearsay<br>901 – Authentication<br>1006 – Accuracy; Improper Use of summary; Records Are Not Voluminous |  |
| 426 | Summation of Claims for L.B. – Count 8 | 403 – Prejudice; Misleading<br>802 – Hearsay<br>901 – Authentication<br>1006 – Accuracy; Improper Use of summary; Records Are Not Voluminous |  |

|      |   |  |  |
|------|---|--|--|
| 429  | Claim for J.A. from VA – Count 9            | 403 – Prejudice; Misleading<br>802 – Hearsay<br>901 – Authentication<br>1006 – Accuracy; Improper Use of summary; Records Are Not Voluminous |  |
| 430  | Summation of Claims for J.A. – Count 9      | 403 – Prejudice; Misleading<br>802 – Hearsay<br>901 – Authentication<br>1006 – Accuracy; Improper Use of summary; Records Are Not Voluminous |  |
|      |   |  |  |
| 720  | Correspondence between Dr. Taba and Counsel | 403 – Prejudice<br>404 – Prior Bad Act Evidence<br>502 – Attorney/Client Privilege<br>901 – Authentication                                   |  |
|      |   |  |  |
| 848  | Statement of Revenue per Physician          | 403 – Prejudice<br>901 – Authentication; Accuracy;<br>6 <sup>th</sup> Amendment – Confrontation/ <i>Bruton</i>                               |  |
| 863  | Statement of Revenue per Physician          | 403 – Prejudice<br>901 – Authentication; Accuracy;<br>6 <sup>th</sup> Amendment – Confrontation/ <i>Bruton</i>                               |  |
|      |   |  |  |
| 1001 | Total Billed to DOL-OWCP                    | 403 – Prejudice; Relevance<br>901 – Authentication<br>1006 – Accuracy  |  |
| 1002 | Total Paid by DOL-OWCP                      | 403 – Prejudice; Relevance<br>901 – Authentication<br>1006 – Accuracy  |  |
| 1009 | Deposits of DOL Funds                       | 403 – Prejudice; Relevance; Cumulative<br>1006 – Improper Use of Summation   |  |

|      |  |   |  |
|------|--|---|--|
| 1021 | Payments Made to Dr. Michael Taba              | 901 – Authentication<br>1006 – Improper Use of Summation; Accuracy; Completeness              |  |
| 1022 | Payments Made to Dr. Michael Taba              | 901 – Authentication<br>1006 – Improper Use of Summation; Accuracy; Completeness              |  |
| 1023 | Other Payments to Dr. Michael Taba             | 901 – Authentication<br>1006 – Improper Use of Summation; Accuracy; Completeness              |  |
| 1024 | Dr. Michael Taba Monthly Bank Account Balances | 403 – Relevance; Prejudice<br>1006 – Improper Use of Summation – Records Are Not “Voluminous” |  |
|      |  |   |  |

DEFENDANT JAMSHID NORYIAN

Dr. Michael Taba takes no position on exhibits proposed by Mr. Jamshid Noryian.

DEFENDANT DEHSHID NOURIAN

Dr. Michael Taba takes no position on exhibits proposed by Mr. Dehshid Nourian.

DEFENDANT CHRISTOPHER RYDBERG

Dr. Michael Taba takes no position on exhibits proposed by Mr. Christopher Rydberg.

DATED this 21<sup>st</sup> day of August, 2023, at Dallas, Texas.

Steven M. Wells, PC  
Attorneys for Defendant

By: /s/ Steven M. Wells .  
Steven M. Wells  
431 W. 7<sup>th</sup> Ave., Suite 107  
Anchorage, AK 99501  
(907)279-3557 (t)  
(907)279-3558 (f)  
ABA #0010066  
*Pro hac vice*

Erin Brennan  
Attorney at Law

By: /s/ Erin Brennan .  
TX Bar No.: 24129239

CERTIFICATE OF SERVICE

I certify that on August 21, 2023,  
I served a copy of the Objections  
To Proposed Exhibits Through  
ECF on:

All parties of record

/s/ Steven M. Wells .  
Steven M. Wells, PC